



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

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October 2, 2003

Sent via e-mail, hand-delivery, and/or U.S. Mail

Mary L. Cottrell, Secretary
Massachusetts Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching for Mass Market Customers,
D.T.E. 03-60

Dear Secretary Cottrell:

Enclosed for filing please find the Attorney General's proposed First Set of Document and Information Requests to the Verizon, AG-VZ-1-1 to 1-2, together with a Certificate of Service. These questions are supplemental to those suggested by Verizon and Conversent. We request that responses to the Verizon and Conversent questions be provided in an electronic Excel spreadsheet file format as well as in paper format where data tables are requested.

Sincerely,

Karlen J. Reed
Assistant Attorney General
Utilities Division
200 Portland Street, 4th Floor
Boston, MA 02114
(617) 727-2200 ext. 3436

KJR/kr
Enc.

cc: Paula Foley, Hearing Officer/AGC (w/enc.).
D.T.E. 03-60 Service List (w/enc.)

Proceeding by the Department of Telecommunications and Energy on its
own Motion to Implement the Requirements of the Federal
Communications Commission’s Triennial Review Order Regarding
Switching for Mass Market Customers.

INSTRUCTIONS

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the document, the addressee and the custodian of the documents. To the extent that a document is self-identifying, it need not be separately identified.

7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recordation system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. If a Document and Information Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.
9. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
10. If, in answering any of these Document and Information requests, you feel that any Request or definition or instruction applicable thereto is ambiguous, set forth the language you feel is ambiguous and the interpretation you are using responding to the Request.
11. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
12. Provide copies of all requested documents. A response which does not provide the Attorney General with the responsive documents, and requests the Attorney General to inspect documents at any location is not responsive.
13. If you refuse to respond to any Document and Information Request by reason of a claim of privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
14. Each request for information includes a request for all documentation which supports the response provided.
15. Provide two copies of each response to the Attorney General.

16. Unless the Request specifically provides otherwise, the term "Company" refers to Verizon MA's intrastate operations and includes all witnesses, representatives, employees, and legal counsel.
17. Please furnish each response on a separate sheet of paper, beginning with a restatement of the question.
18. Please provide all responses to requests by October 23, 2003 as per the Hearing Officer's ruling and Memorandum of September 25, 26, 2003.

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Proceeding by the Department of Telecommunications and Energy on its)	
own Motion to Implement the Requirements of the Federal)	
Communications Commission's Triennial Review Order Regarding)	D.T.E. 03-60
Switching for Mass Market Customers.)	
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**ATTORNEY GENERAL'S
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS
TO VERIZON MASSACHUSETTS**

- AG-VZ-1-1** Please provide the latest update to the Massachusetts Competitive Profile and provide both the Summary and the Detailed Reports. Please supply the data in the same format as provided in *Verizon's Alternative Regulation Plan*, DTE 01-31, and supply it in an Excel spreadsheet file as well as in a paper version.
- AG-VZ-1-2** Please provide a list of all wire centers in Massachusetts (matching the Competitive Profile discussed in AG-VZ-1-1) that includes the number of collocation customers by type of collocation that are present as well as what types of collocation can currently be ordered and provisioned in each office. Please provide the data for 12/31/99, 12/31/00, 12/31/01, 12/31/02, and 6/30/03. Please supply the data in an Excel spreadsheet file as well as in a paper version.

Proceeding by the Department of Telecommunications and Energy on its
own Motion to Implement the Requirements of the Federal
Communications Commission’s Triennial Review Order Regarding
Switching for Mass Market Customers.

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding by either hand delivery, mail, and/or e-mail.

Karlen J. Reed
Assistant Attorney General
Utilities Division
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Boston, MA 02114
(617) 727-2200 ext.3436